

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

William Jay Hammons,
Petitioner,

v.

Thomas Carroll, Et.Al.,
Respondent.

Civil Action No. 05-718-***

PLAINTIFFS FIRST SET OF REQUESTS FOR ADMISSIONS
TO THE DEFENDANTS

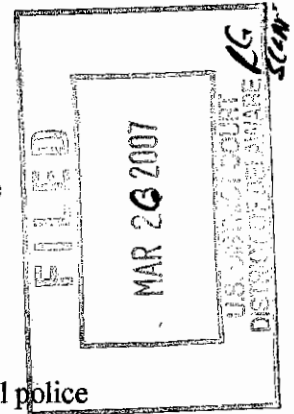
Plaintiff requests that the defendants Thomas Carroll and Beau Biden, make the following admissions, within 30 days pursuant to Fed. R. civ. P. 36

That each of the following documents is genuine:

1. All DNA reports submitted by petitioner in his appendix to his habeas corpus, all police reports, and all other exhibits submitted as part of the aforementioned appendix.

That each of the following fact is true:

1. That all DNA evidence collected and tested by the state excluded petitioner as a contributor to all genetic with the only exception being the two biological samples that petitioner voluntarily submitted for testing.
2. That two knives were entered into evidence at trial; one being a photograph of the actual two inch knife that belonged to petitioner, the other being an actual knife that was approximately four inches long and not belonging to petitioner.
3. That the "Y" chromosomes' presence in exhibit (A-113) proves conclusively that the pubic hair found on the alleged rape victim Kristen Bakalar was inherently male and not that of a human female.
4. That the Mitochondrial DNA taken from the suspect hair sample conclusively excluded petitioner as



being the source of the hair. (A-115).

5. That the Mitochondrial DNA also conclusively proved that every human being in petitioners maternal lineage was also excluded as a source of the suspect hair. (A-150).

6. That the suspect hair belongs to an unknown male caucasion who's DNA profile has never been entered into the states DNA data bank for comparisons.

7. That the state never identified the suspect hair as being that of an unknown male caucasion at trial or in any stipulation.

8. That the alledged victim, Kristen Bakalar testified that she was shaved in her pubic region at the time of the incident and that she was a virgin. (A-179-180),(A-176).

9. That Kristen Bakalar only ever alleged one assailant.

10. That caller I.D. information from the residence of Teresa Maas , an independent eyewitness conclusively proved that defendant was at his place of residence at the exact same place and time that police allege Ms. Bakalar was attacked. (A102, A152,and A157).

11. That it was established that petitioner did not own a car at the time of the Bakalar incident. (A-169).

12. That in all likelihood the DNA evidence would not have been heard by the jury after the state and defense counsel exluded the DNA expert witness from testifying at trial because no police witness or any other witness would have been qualified to give testimony on the subject of DNA..

13. That no DNA report was ever submitted into evidence at trial.

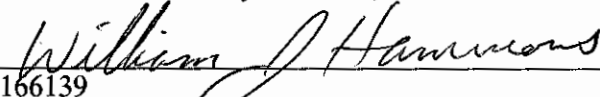
14. That the stipulation offered at trial never once used the acronym , "DNA".

That each of the following statements is true:

1. That trial counsel for petitioner did in fact continually advise petioner that he could never win at trial and that if he refused to plead out he would definetly be found guilty and would be given life in prison.

2. That it is entirely possible that the pubic hair found in Kristen Bakalar's underwear did in fact belong to her alleged assailant.
3. That petitioner is factually innocent of all charges relating to Kristen Bakalar.
4. That there was never sufficient evidence to charge petitioner with the charges relating to Kristen Bakalar.

Submitted this 24 day of March, 2007.


166139

Delaware Correctional Center
1181 Paddock road
Smyrna, DE 19977

Certificate of Service

I, William Jay Hammons hereby certify that I have served a true and correct copy(ies) of the attached Request for Admissions Upon the following parties/persons:

To: Elizabeth R. McFarlan
Deputy Attorney General
Dept. Of Justice
820 N. French St.
Wilmington, DE. 19801

To:

To:

To:

BY PLACING SAME IN A SEALED ENVELOPE, and depositing same in the United States Mail at the Delaware Correctional Center, Smyrna, DE 19977.

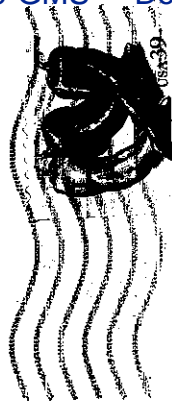
On this 24 day of March, 2007


166139

William Ray Hammons
#166139
DEL. Coll. ctr.
1181 Padlock Rd.
Smyrna, DE. 19979

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